

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEBORAH FRAME-WILSON *et al.*, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

Case No. 2:20-cv-00424-JHC

STIPULATED MOTION AND ORDER
REGARDING CLASS CERTIFICATION
BRIEFING SCHEDULE AND
RESCHEDULING THE HEARING ON
PLAINTIFFS' PRIVILEGE MOTION

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

Case No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

No. 2:22-cv-00965-JHC

STIPULATION

The parties, by and through their counsel, have agreed and stipulate as follows:

1. The parties agree that good cause justifies 1) a one-month interim extension of the Court's current class certification briefing schedule in the *De Coster* and *Frame-Wilson* cases and 2) deferring the Court's December 13, 2024 hearing on Plaintiffs' Motion to Compel Production of Documents from Amazon's Privilege Logs and for Appointment of a Special Master ("Privilege Motion") until January 14 or 15, 2025, if convenient for the Court.

2. Plaintiffs in both the *De Coster* and *Frame-Wilson* cases raised their concerns with Amazon regarding its recent production of circa 120 terabytes of new data relevant to Plaintiffs' motions. Amazon used these sets of data in connection with its Opposition to the *De Coster* Plaintiffs' Motion for Class Certification and the accompanying expert report. Plaintiffs assert that they need time to review, understand, and analyze these data before responding. As a professional courtesy, Amazon agrees to a 30-day interim extension to class certification deadlines in both *De Coster* and *Frame-Wilson* while the parties meet and confer to discuss a potentially longer extension.

3. The parties therefore propose a 30-day interim extension of the existing class certification schedules, as follows:

<i>Frame-Wilson</i>		
Briefs	Current Deadline [Dkt. 172]	Proposed Deadline
Class Certification Brief	December 20, 2024	January 21, 2025
Class Certification Opposition Brief	March 21, 2025	April 21, 2025
Reply Brief ISO Class Certification	May 23, 2025	June 23, 2025
<i>De Coster</i>		
Briefs	Current Deadline [Dkt. 160; 220]	Proposed Deadline
Reply Brief ISO Class Certification and Opposition to Amazon's Motion to Exclude & any Motion to Exclude Amazon's Expert	January 24, 2025	February 24, 2025
Amazon's Reply ISO Motion to Exclude & Opposition to Plaintiffs' Motion to Exclude	March 3, 2025	April 2, 2025
Plaintiffs' Reply ISO Motion to Exclude	March 31, 2025	April 30, 2025

4. Amazon's lead counsel, Karen Dunn, is unable to attend the Court's December 13, 2024 hearing on Plaintiffs' Privilege Motion but is available on January 14 or 15, 2025. As a professional courtesy, Plaintiffs agree to defer the hearing until either date, assuming it is convenient for the Court.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned counsel of record, and the parties ask the Court to order, that:

5. The class certification deadlines contained in *Frame-Wilson*, Dkt. No. 172 and *De Coster*, Dkt. Nos. 160 and 220 are modified as follows.

6. In *Frame-Wilson*, Plaintiffs' deadline to file their class certification motion is **January 21, 2025**; Amazon's deadline to oppose Plaintiffs' class certification motion is **April 21, 2025**; Plaintiffs' deadline to file their reply in support of class certification is **June 23, 2025**.

7. In *De Coster*, Plaintiffs' deadline to file their reply in support of class certification, their opposition to Amazon's motion to exclude their expert, and any motion to exclude Amazon's expert is **February 24, 2025**; Amazon's opposition to any motion by Plaintiffs to exclude Amazon's expert is **April 2, 2025**; Plaintiffs' deadline to file a reply in support of any motion they file to exclude Amazon's expert is **April 30, 2025**.

8. The December 13, 2024 hearing on Plaintiffs' Privilege Motion is deferred and is rescheduled on _____.

IT IS SO STIPULATED.

DATED: December 10, 2024 HAGENS BERMAN SOBOL SHAPIRO LLP

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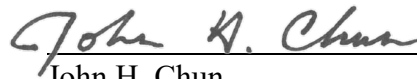
ORDER

Pursuant to the above stipulation, IT IS SO ORDERED. Furthermore:

In *De Coster*, the Court DIRECTS the Clerk to renote (1) Plaintiffs' Motion for Class Certification, Case No. 21-693, Dkt. # 180, for February 24, 2025; and (2) Amazon's Motion to Exclude, Case No. 21-693, Dkt. # 230, for April 2, 2025.

Finally, the Court STRIKES the December 13, 2024 hearing. The Court is unavailable on January 14 and 15, 2025. Therefore, on January 24, 2025, at 9:00 a.m., at a conference room at the United States Courthouse, counsel for the parties shall meet and confer to resolve Plaintiffs' pending motions to compel. Counsel shall contact the Courtroom Deputy via email, at ashleigh_drecktrah@wawd.uscourts.gov, for the location of the conference room. If the parties are unable to resolve the Motions by 10:00 a.m. that day, then the Court will proceed with oral argument on the motions. Oral argument will take place in courtroom 14106. Counsel shall immediately notify the Court if the motions are resolved prior to the hearing scheduled above.

Dated: December 10, 2024.



John H. Chun

UNITED STATES DISTRICT JUDGE